

Hi Marshall,

I hope you had a good weekend. This message is meant to recap our visit and provide responses to some of the questions you raised during our visit, outline my understanding of the conclusions we came to on the questions that were raised, and to have a shared understanding of follow up items. Please share with your colleagues as you see fit.

Effective June 12, 2019, the EPA has new permit applications forms. The applications may be accessed at:

[ HYPERLINK "<https://www.epa.gov/npdes/npdes-applications-and-forms>" ]

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You will need to submit Forms 1 and 2E.

#### Conclusions/Issues Discussed

1. **Regarding the situation where two pumps are pulling from one sump, and only one of the pumps is reasonably accessible:** It is important that any representative sampling is in line with the regulations laid out in the permit application forms, and that the logic behind the representative sampling is documented specifically.

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

- 2.
3. The application requires that you sample from the outfall. As identified in on the application form, the location of each outfall (i.e., where the coordinates are collected) is be the point where the discharge is released into a water of the United States. From the information you presented it appears that both pumps are contributing to the same outfall. Further, you stated that the water quality would be the same from either pump, because of the pump location within the well. If either pump is equally representative of the discharge from that outfall, you should be able to draw your sample for either pump location.

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- 4.
5. **Regarding the situation where the outfall itself is inaccessible, but the two separate cooling water pipes leading to the outfall are accessible:** It was very helpful to see this situation in person. We understand that the outfall itself is inaccessible. For this scenario, the 'sampling' section of form 2E states that the applicant should 'Collect samples [...], or at any site adequate for the collection of a representative sample.' Sampling of the two source pipes leading to the outfall can be representative of the outfall discharge water in this case. The time when you sample each pipe should be representative of your normal operation, to the extent feasible, with all processes that contribute to the outfall in normal operation. Please specifically document the relative and overall flows of each source pipe, and document the inaccessibility of the outfall itself.

2. 6. Temperature monitoring equipment; Ex. 5 Deliberative Process (DP)  
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7. The permit application requires only grab samples for temperature. We discussed the possibility of some continuous temperature monitoring in the permit. Ecology has some useful information on temperature monitoring. Including the following:

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Commented [PS1]: Martin –The attachment is a 2003 document. This looks like an update.

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8. [ HYPERLINK "https://fortress.wa.gov/ecy/publications/documents/1803205.pdf" ]

The accuracy for temperature monitoring in our permit template is +/- 0.2°C.

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3. Seepage Water; Ex. 5 Deliberative Process (DP)  
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Ex. 5 Deliberative Process (DP) If there is a discharge of pollutants to waters of the U.S. you will want permit coverage. We recommend that you sample the outfalls Ex. 5 Deliberative Process (DP) so we can have a basis for any decisions moving forward. Ex. 5 Deliberative Process (DP)  
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4. 9. Application to EPA: Brian Wilson shared that the Corps will likely Ex. 5 Deliberative Process (DP)  
Ex. 5 Deliberative Process (DP) submit an application by May 2020. Ex. 5 Deliberative Process (DP)  
Ex. 5 Deliberative Process (DP)

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#### Follow-up:

1. PCB's: Marshall will send me PCB monitoring results to inform the permit writing documentation process (Done). Once he has results from his follow up sampling on the transformer in question he will get those to me as well.
2. Parameters: Martin and Marshall will give a close read to the application forms and coordinate on which parameters make sense to sample for at any given outfalls. Ex. 5 Deliberative Process (DP)  
Ex. 5 Deliberative Process (DP)  
Ex. 5 Deliberative Process (DP), but I'm happy to discuss.
3. Representative sampling of identical outfalls: Martin and Marshall will coordinate on understanding provisions and documentation for representative sampling regarding Units 1-16 and Units 17-27 (except 18+26). Again, application form 2C states that "When an applicant has two or more outfalls with substantially identical effluents, the NPDES permitting authority may allow the applicant to test only one outfall and report those quantitative data as applying to the substantially identical outfall. If the permitting authority grants your request, attach a separate sheet to the application form identifying the outfall tested and describing why the other outfall(s) are substantially identical." For the 16 identical outfalls, 10(??) samples will be sufficient in the permit application, along with documentation of the outfalls being identical. For the 8 identical outfalls (17-27 except 18 and 26), 5(??) samples will be sufficient for the permit application. [I'd love to say something concrete like this, I feel like we can't just ask them to use their judgement on this one.]

## Ex. 5 Deliberative Process (DP)

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5. **Flow Diagrams:** We didn't discuss this specifically, but we generally discussed that it's helpful for you all if I specifically request diagrams and schematics since you have so much material. For the other dam applications, the permittee's submitted flow diagrams which were helpful in the permit writing process. I attached an example of a simple diagram. For each general type of outfall, it would be really helpful to have something like this with the permit application.

6. NPDES for the Sewage Treatment Plant (WA 0022420): This facility is still in our system. Jenny Wu will be in contact with you to facilitate termination of that permit.

[ HYPERLINK

"https://enviro.epa.gov/enviro/ICIS\_DETAIL\_REPORTS\_NPDESID.icis\_tst?npdesid=WA0022420&npvalue=1&npvalue=13&npvalue=14&npvalue=3&npvalue=4&npvalue=5&npvalue=6&rvalue=13&npvalue=2&npvalue=7&npvalue=8&npvalue=11&npvalue=12" ]

7.

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